

1 HENRY WEISSMANN (State Bar No. 132418)
henry.weissmann@mto.com

2 DANIEL B. LEVIN (State Bar No. 226044)
daniel.levin@mto.com

3 JORDAN D. SEGALL (State Bar No. 281102)
jordan.segall@mto.com

4 MAGGIE THOMPSON (State Bar No. 313898)
maggie.thompson@mto.com

5 MUNGER, TOLLES & OLSON LLP

6 350 South Grand Avenue, 50th Floor

7 Los Angeles, California 90071-1560

Telephone: (213) 683-9100

8 Facsimile: (213) 687-3702

9 Attorneys for Defendants

10 PLAINS ALL AMERICAN PIPELINE, L.P.

and PLAINS PIPELINE, L.P.

11 UNITED STATES DISTRICT COURT

12 CENTRAL DISTRICT OF CALIFORNIA

13
14 GREY FOX, LLC a California limited
15 liability company; MAZ PROPERTIES,
16 INC., a California Corporation; BEAN
17 BLOSSOM, LLC, a California limited
18 liability company; WINTER HAWK,
19 LLC, a California limited liability
company, and MARK W. TAUTRIM,
individually and o/b/o the MARK W.
TAUTRIM REVOCABLE TRUST,

20 Plaintiffs,

21 vs.

22 PLAINS ALL AMERICAN PIPELINE,
23 L.P., a Delaware limited partnership,
24 PLAINS PIPELINE L.P., a Texas
limited partnership,

25 Defendants

Case No. 2:16-cv-03157-PSG-JEM_

**PLAINS DEFENDANTS' NOTICE
OF MOTION & MOTION FOR
PARTIAL SUMMARY JUDGMENT**

Date: December 1, 2023

Time: 1:30 p.m.

Ctrm.: 6A

Judge: Hon. Philip S. Gutierrez

*Filed concurrently with Memorandum
of Points and Authorities, Statement of
Uncontroverted Facts, Declaration of
Jordan D. Segall, Declaration of
William Dean Gore, Jr., and
[Proposed] Order*

NOTICE OF MOTION & MOTION

TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE that on December 1, 2023 at 1:30 p.m., or as soon thereafter as the matter may be heard, before the Honorable Philip S. Gutierrez, in Courtroom 6A of the United States District Court, Central District of California, located at the First Street Courthouse, 350 West 1st Street, Los Angeles, California 90012, Defendants Plains All American Pipeline, L.P., and Plains Pipeline, L.P., by and through their attorneys of record herein, will move this Court for an order granting summary judgment on claims 4, 6, 7, 8, 11, 12, and 13 (all claims against Plains except claim 14, brought by plaintiff Grey Fox, LLC only).

Defendants' motion is based on this Notice of Motion and Motion; the accompanying Memorandum in Support of Defendants' Motion for Partial Summary Judgment; the Statement of Uncontroverted Facts in Support of Plains' Motion for Partial Summary Judgment; the Declaration of William Dean Gore, Jr.; the Declaration of Jordan D. Segall; all exhibits attached thereto; all pleadings and papers on file in this action; the oral argument of counsel, and any other matters the Court may consider. This motion is made following the conference of counsel pursuant to LR 7-3, which took place on September 21, 2023.

DATED: October 6, 2023

Respectfully submitted,

MUNGER, TOLLES & OLSON LLP
HENRY WEISSMANN
DANIEL B. LEVIN
JORDAN D. SEGALL
MAGGIE THOMPSON

By: /s/ Henry Weissmann

HENRY WEISSMANN
*Attorneys for Plains All American Pipeline,
L.P. and Plains Pipeline, L.P.*

